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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

Eleodoro ANGULO-Vega,

Defendant

FILED  
2008 AUG -5 AM 9:55  
Magistrate Docket No. 08 MJ 24 16

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

COMPLAINT FOR VIOLATION OF:

Title 8, U.S.C., Section 1326

Deported Alien Found in the  
United States

Title 18, United States Code, Section 751

Escape From Custody (Felony)

The undersigned complainant, being duly sworn, states:

**COUNT 1**

On or about **August 4, 2008** within the Southern District of California, defendant, **Eledoro ANGULO-Vega**, an alien, who previously had been excluded, deported and removed from the United States to **Mexico**, was found in the United States, without the Attorney General or his designated successor, the Secretary of the Department of Homeland Security (Title 6, United States Code, Sections 202(3) and (4), and 557), having expressly consented to the defendant's reapplication for admission into the United States; in violation of Title 8 United States Code, Section 1326.

**COUNT 2**

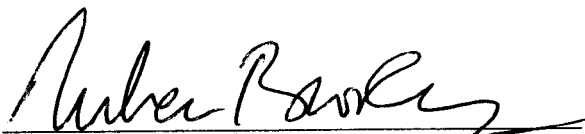
On or about **August 4, 2008** within the Southern District of California, the defendant, **Eledoro ANGULO-Vega**, did knowingly escape from custody of an officer of the United States, to wit the United States Border Patrol, wherein he was held by virtue of his lawful arrest for a (felony) offense, to wit, Title 8 United States Code, Section 1326, all in violation of Title 18, United States Code, Section 751(a).

And the complainant further states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

  
SIGNATURE OF COMPLAINANT

James Trombley  
Senior Patrol Agent

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS **5th** DAY OF **AUGUST 2008**



Ruben B. Brooks  
UNITED STATES MAGISTRATE JUDGE

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### PROBABLE CAUSE STATEMENT

On August 4, 2008, at approximately 5:00 a.m., while performing assigned line watch duties in the area of Tecate, California, Supervisory Border Patrol Agent H. Guerra observed multiple sets of footprints crossing the United States/Mexico International Border in an area approximately two miles east of the Tecate, California Port of Entry. SBPA Guerra requested assistance, via service radio, another Border Patrol unit to get north, in order to apprehend the group of suspected illegal aliens. Border Patrol Agents J. Arevalo and J. Arimas responded to the call. Upon arriving in the area they observed a group of eight individuals concealed in thick brush. Agents Arevalo and Arimas identified themselves as United States Border Patrol Agents, and Agent Arevalo questioned each individual as to their citizenship and nationality. Each individual, including one later identified as the defendant **Eledoro ANGULO-Vega**, admitted to being citizens and nationals of Mexico without any immigration documents allowing him to enter or remain in the United States. Agents Arevalo and Arimas arrested all eight individuals.

While the eight individuals were being searched, ANGULO requested to speak with a Supervisor. ANGULO freely stated to SBPA Guerra that had been apprehended before by the Border Patrol and was identified as a foot guide. ANGULO also stated he was guiding the other seven individuals and was to receive \$200.00 USD for every individual he smuggled. ANGULO volunteered this information because he had been warned during a prior arrest that he would be prosecuted as a foot guide the next time he was apprehended. All eight individuals were transported to the Tecate Processing Center.

Routine record checks of the defendant revealed a criminal and immigration history. The defendant's record was determined by a comparison of his criminal record and the defendant's current fingerprint card. Official immigration records of the Department of Homeland Security revealed the defendant was previously deported to Mexico on **June 25, 2008** through **San Ysidro, California**. These same records show that the defendant has not applied for permission from the Attorney General of the United States or his designated successor, the Secretary of the Department of Homeland Security, to return to the United States after being removed.

The defendant was advised of his Miranda rights and he was willing to speak without an attorney present. ANGULO once again freely admitted to being a citizen and national of Mexico in the United States illegally. ANGULO also admitted that he did not have any immigration documents that would allow him to enter or remain in the United States legally.

On August 04, 2008, at approximately 12:30 p.m., ANGULO escaped out of holding cell # 3 at the Tecate Processing Center.

The witness Jose BUCIO-Galindo stated ANGULO told him to stand by the cell window in order to block the view of agents. The witness stated he declined to do so. ANGULO then pulled out what appeared to be an identification card and began sliding it in a small crack between the back door and the back door frame. After a short period of time, ANGULO was able to pop open the back door of the cell. ANGULO then escaped through the back door, closing it behind him.

An unidentified witness stated she observed a man running from the area where the Tecate Processing Center is located, towards Mexico on State Route 188.